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September 11, 2023

Via ECF

Hon. Kiyo A. Matsumoto, U.S.D.J.
United States District Court, E.D.N.Y.
225 Cadman Plaza East, Courtroom 6C-S
Brooklyn, New York 11201

Re: Joint Letter Motion for So Ordered Protective Order
Case No. 1:22-cv-05686-KAM-VMS — *Justin Lanasa et al. v. Erik Stiene et al.*

Dear Judge Matsumoto:


This office represents Defendants in this action. We write on behalf of all parties to request the Court's approval of the parties' proposed protective order (enclosed).

Defendants aver they have never consented to editorialization of the caption to reflect Plaintiffs' assertion that Lois Stiene is known as Rachel Stiene, which Defendants aver is categorically false and unsupported.¹ Although Plaintiffs contest this assertion, Defendants do not see an immediate need to consume resources of the parties and the Court in connection with this dispute. In sum, Defendants want to clearly memorialize their opposition to any attempt by Plaintiffs to unilaterally alter the parties to this case and/or treat Rachel Stiene as a party to this action.

We thank the Court for its time and consideration.

Respectfully submitted,

FARBER SCHNEIDER FERRARI LLP

By: 
Robert B. Lower

cc: Counsel of record; Hon. Vera M. Scanlon, U.S.M.J. (via ECF)

¹ For clarity, although Defendants are aware the enclosed protective order's caption reads "LOIS STIENE, aka RACHEL STIENE," Defendants oppose any attempts to characterize Lois Stiene as Rachel Stiene or name Rachel Stiene as a party.